

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUNICULAR FUNDS, LP, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

PIONEER MERGER CORP., PIONEER  
MERGER SPONSOR LLC, JONATHAN  
CHRISTODORO, RICK GERSON, OSCAR  
SALAZAR, RYAN KHOURY, SCOTT  
CARPENTER, MATTHEW COREY,  
MITCHELL CAPLAN, and TODD DAVIS,

Defendants.

Civil Action No. 22-10986-JSR

**NOTICE OF MOTION FOR ATTORNEYS' FEES,  
LITIGATION EXPENSES, AND INCENTIVE AWARD**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated March 13, 2024 (ECF 84), Lead Plaintiff Funicular Funds, LP ("Lead Plaintiff"), on behalf of itself and the Class, and Lead Counsel Morris Kandinov LLP ("Lead Counsel") will and do hereby move this Court, before the Honorable Jed S. Rakoff, on May 28, 2024 at 3:00 p.m., for entry of an Order awarding attorneys' fees, litigation expenses, and an incentive award. This motion is based on (i) the Declaration of Aaron T. Morris in Support of: (A) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (B) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (ii) the Declaration of Jacob Ma-

Weaver in Support of: (A) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (B) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (iii) the Memorandum of Law in Support of Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; and (iv) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadline for objecting to the motion has passed.

Dated: April 30, 2024

Respectfully submitted,



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